

United States District Court

MAY 11 2015

SOUTHERN

DISTRICT OF

TEXAS

McALLEN DIVISION

David J. Bradley, Clerk

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

Raul Romero

PRINCIPAL

A208 171 479

YOB:

1991

United States

Case Number:

M-15-0751-M

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about May 9, 2015 in Hidalgo ^{Starr} County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Jose Dagoberto Munto-Hernandez, citizen and national of El Salvador, who had entered the United States in violation of law, did knowingly transport, or move or attempt to transport said alien in furtherance of such violation of law within the United States, that is, from a location in Laredo, Texas to the point of arrest near Roma, Texas.

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY
I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On May 9, 2015 at approximately 8:45 p.m., the Rio Grande City Border Patrol Station was contacted to assist a Texas Department of Public Safety Trooper with a traffic stop. Agent S. Cervantes responded to the request and was informed by Trooper Lopez that he had performed a vehicle stop for following too closely and having an improperly placed / obscured license plate. Agent Cervantes questioned the driver, identified as Raul Romero, and was told that he was a United States Citizen. Agent Cervantes additionally questioned both passengers. The front seat passenger, identified as Judith Lozoya, stated that she was a United States citizen. The back seat passenger, identified as Jose Dagoberto Munto-Hernandez, stated that he was a citizen of El Salvador and admitted to being in the United States illegally. All subjects were arrested and transported to the Rio Grande City Border Patrol Station for questioning.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Approved by: Linda Requevez, AVSA
5/11/15

Signature of Complainant

Sworn to before me and subscribed in my presence,

Israel Perez Senior Patrol Agent
Printed Name of Complainant

May 11, 2015

Date

McAllen, Texas
City and State

Peter E. Ormsby U. S. Magistrate Judge
Name and Title of Judicial Officer

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-15-0751 -M

RE: Raul Romero

A208 171 479

CONTINUATION:

CONTINUATION:

PRINCIPAL STATEMENTS:

Raul Romero was read his rights at the Rio Grande City Border Patrol Station. The subject stated that he understood his rights and was willing to make statements without an attorney present.

Raul Romero stated that he was a United States citizen. He claimed that his friend, Chuy, had asked him to pick up an illegal alien in a neighborhood in Laredo, Texas and transport the illegal alien to Donna, Texas. Romero stated that he was going to receive \$200 from Chuy for transporting the illegal alien. Romero also stated that this was his third time he has been arrested by the Border Patrol for transporting illegal aliens.

MATERIAL WITNESS STATEMENTS:

Jose Dagoberto Munto-Hernandez was read his rights at the Rio Grande City Border Patrol Station. The subject stated that he understood his rights and was willing to make statements without an attorney present.

Jose Dagoberto Munto-Hernandez admitted to being a citizen and national of El Salvador who is illegally present in the United States. He claims that he made arrangements with a smuggler named Oscar and paid \$1,000 to be smuggled into the United States and would pay an additional \$3,000 once he arrived in Houston, Texas. He stated that he walked across the Rio Grande River with two other individuals. The two individuals that he crossed with were then apprehended by the Border Patrol. He stated that he hid in the brush for several days and then ran to a nearby store. At the store, Munto contacted his family to make his smuggling arrangements. He was directed to a street where he waited to be picked up. A black four door sedan arrived at the street and then honked its horn. Munto approached the vehicle and was asked if his name was Jose. Munto then proceeded to enter the back seat of the vehicle where he observed a male driver and a female passenger. Munto was shown a DHS photo line-up and positively identified Romero as the driver and Lozoya as the front seat passenger of the vehicle.

OTHER STATEMENTS:

Judith Lozoya was read his rights at the Rio Grande City Border Patrol Station. The subject stated that he understood his rights and was willing to make statements without an attorney present.

Judith Lozoya stated that she was a United States citizen. She stated that she was traveling with her husband, Raul Romero, from Laredo, Texas to Donna, Texas to transport an illegal alien. Lozoya additionally said that she knew it was illegal to transport illegal aliens. She stated that this was her third time transporting illegal aliens and had previously been apprehended once by the Border Patrol for transporting illegal aliens.